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 CHRISTINE D. REYES

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIA VIRGINIA REYES and
 CHRISTINE REYES,

Defendants.

) CASE NO. 10-CR-0146-VRW

)
) STIPULATION AND ~~PROPOSED~~
) ORDER CONTINUING STATUS
) CONFERENCE

) **Current Hearing Date: January 6, 2011**

) Time: 2:00 p.m.

) Judge: Hon. Vaughn R. Walker

) **Proposed Hearing Date: March 10, 2011**

) Time: 2:00 p.m.

) Judge: Hon. Vaughn R. Walker (or new
) judge to be assigned)

The parties jointly request that the Court reschedule the Status Conference currently set for January 6, 2011 at 2:00 p.m. to March 10, 2011 at 2:00 p.m. (or to a date convenient to the Court).

1. This case is currently set for a status conference on January 6, 2011.

2. Christine Reyes' counsel and government counsel are currently discussing a potential disposition in her case. No agreement has been reached, but the parties believe that further discussions are appropriate.

3. In addition, counsel for Ms. Reyes received a response to its subpoena served on Joann Blessing-Moore, Ms. Reyes' former employer. The documents produced include QuickBooks printouts, as we requested, but the printouts are incomplete, with information cut off, so that a

1 complete understanding of the payments by Blessing-Moore to Ms. Reyes is not possible. These
2 documents are important to analyze because the amounts reflected on them constitute the income
3 allegedly unreported to the Internal Revenue Service.

4 4. Counsel for the government and for Christine Reyes agree that, if convenient for the
5 Court, the status conference should be continued to March 10, 2011 or to such other date as is
6 convenient, in light of the anticipated re-assignment of this case to a different judge.

7 The parties further stipulate and jointly request that time be excluded from the Speedy
8 Trial Act calculations from Thursday, January 6, 2011 through Thursday, March 10, 2011 for
9 effective preparation of counsel, including among other reasons the need to analyze the recently
10 received evidence and obtain additional evidence in defense of the case. The parties agree that
11 the ends of justice served by granting such a continuance outweigh the best interests of the public
12 and the defendants in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).
13

14 IT IS SO STIPULATED.

15
16 DATED: January 5, 2011

_____/s/
DAVID W. SHAPIRO
Attorney for Christine D. Reyes

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18
19 DATED: January 5, 2011

_____/s/
THOMAS MOORE
Assistant United States Attorney

~~PROPOSED~~ ORDER

For good cause shown, the status conference now scheduled for Thursday, January 6, 2011 is vacated. The matter shall be added to the Court's calendar on Thursday, March 10, 2011 at 2:00 p.m.

In addition, for the reasons stated in the accompanying application, the Court finds that an exclusion of time from January 6, 2011 through March 10, 2011 is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A). The failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: January 6, 2011

